

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

QUENNA LASHONDA DEAN

25-00674 – JAW

TRUSTEE'S NOTICE AND MOTION TO MODIFY

COMES NOW Harold J. Barkley, Jr, the duly appointed and qualified Standing Trustee in the above cause and moves to modify the above proceeding for reasons to be shown below.

1. The Debtor's Chapter 13 Plan was confirmed by Order of this Court entered on May 13, 2025.
2. That, on July 24, 2025, Freedom Mortgage Corporation filed a Notice of Post-petition Mortgage Fees, Expenses, and Charges (DK # 24) in the amount of \$200.00 for Bankruptcy / Proof of Claim fees incurred May 16, 2025, and \$100.00 for Plan Review in the amount of \$100.00 incurred April 9, 2025, for a total of \$300.00.
3. Therefore, the Debtor's Plan should be modified to pay Creditor Freedom Mortgage Corporation for the Post-petition Mortgage Fees, Expenses and Charges in the amount of \$300.00 for Proof of Claim
4. That, the Debtor's wage deduction order should be amended as necessary to comply with the terms of this Motion.
5. The indebtedness of those creditors not timely filing proof of claims should be paid \$0.00, and said indebtedness should be discharged upon completion of this plan.
6. **You are hereby notified** that all Objections must be made in writing to the Clerk of this Court. Attorneys and Registered Users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at U. S. Bankruptcy Court, U. S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, with a copy mailed to the Trustee at the address below.
7. **You are further notified** that all Objections must be made within thirty (30) days of this date, being **August 25, 2025.**
8. **You are further notified** that should no Objection be timely filed, the Court will be requested to enter an Order ex parte.
9. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Motion to Modify,

and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: July 25, 2025

Respectfully submitted,

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR. – MSB #2008
CHAPTER 13 TRUSTEE
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CERTIFICATE

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U S Trustee
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Hon. Thomas Carl Rollins, Jr.
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Bankruptcy Department
11988 Exit 5 Parkway Building 4
Fishers, IN 46037-7939

Dated: July 25, 2025

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.